

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MAINE

	)	
In re	)	
	)	
MONTREAL MAINE & ATLANTIC	)	CHAPTER 11
RAILWAY, LTD.	)	CASE NO. 13-10670-LHK
	)	
Debtor	)	
	)	

**WRONGFUL DEATH CLAIMANTS' WITHDRAWAL OF THEIR  
MOTION FOR FORMATION OF CREDITORS' COMMITTEE**

The representatives of the probate estates of the 42 victims<sup>1</sup> (the “Wrongful Death Claimants”) of the massive explosion in Lac-Mégantic, Quebec, from the derailment of a train operated by the Debtor (the “Disaster”) hereby withdraw the Wrongful Death Claimants’ Motion for Formation of Creditors’ Committee filed on August 22, 2013 [Docket No. 76] (the “Motion”). By way of explanation, the Wrongful Death Claimants state:

1. At the preliminary hearing on the Motion held on September 13, 2013, this Court indicated that it was unlikely to grant the Motion and suggested that victims of the Disaster consider participating in this case through unofficial committees. Accepting the Court’s suggestion, the legal representatives of 42 of those killed in the Disaster have agreed to work together in this case as the Unofficial Committee of Wrongful Death Claimants (the “Wrongful Death Committee”).<sup>2</sup>

2. The Wrongful Death Committee looks forward to working with the Trustee, the Canadian governmental units, and any other unofficial committee that may be formed. The

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<sup>1</sup> The names of estate representatives and victims are provided on attached Exhibit A.

<sup>2</sup> As proposed by the Court, the Wrongful Death Committee will seek payment by the estate of compensation of the committee’s professionals and reimbursement of its and their expenses at an appropriate point later in the case, and understand that there is no assurance that such compensation or reimbursement will be granted.

Wrongful Death Claimants continue to oppose the motion by the Canadian governmental units and the so-called class action representative for appointment of an official committee that would include themselves and perhaps others. As explained in the Wrongful Death Claimants' Objection to Motion of "Informal Committee of Quebec Claimants" for Appointment of Creditors' Committee filed September 11, 2013 [Docket No. 214], the Wrongful Death Claimants believe that a multi-constituency committee would be unable to function because of internal conflicts and could not truly represent wrongful death claimants. Any such committee would be a waste of the estate's money – funds that, because of the administrative expense priority of the Wrongful Death Claimants, rightfully should be reserved for them under a chapter 11 plan.

Marie Semie Alliance, *et al.*

By their attorneys,

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Exhibit A

1. The estate representatives are Seraphin Alliance (on behalf Alliance, Marie Semie); Elise Dubois Couture (on behalf of Beaudoin, David Lacroix); Pascal Charest (on behalf of Begnoche, Alyssa Charest); Pascal Charest (on behalf of Begnoche, Bianka Charest); Gaston Begnoche (on behalf of Begnoche, Talitha Coumi); Suzanne Bizier, Alain Bizier (on behalf of Bizier, Diane); Lisette Fortin-Bolduc, (on behalf of Bolduc, Stephane); Genevieve Dube (on behalf of Bouchard, Yannick); Michel Boulanger (on behalf of Boulanger, Eliane Parenteau); Louise Boulet (on behalf of Boulet, Marie-France); Colette Boulet, (on behalf of Boulet, Yves); Isabelle Boulanger, Rene Boutin, Sophie Boutin, Roxanne Boutin (on behalf of Frederic Boutin); Real Breton (on behalf of Breton, Genevieve); Yann Proteau (on behalf of Champagne, Karine); Cynthia Boule, Jean-Guy Boule, Alexandre Boule (on behalf of Sylvia Charron); Louise Courture (on behalf of Clusiaux, Kathy); Sonia Pepin; Jeremy Custeau, Theresa Pouliot, Michael Cousteau, Rejean Custeau, Kathleen Bedard, Simon Custeau, Richard Custeau, Sylvie Custeau (on behalf of Real Custeau); Therese Dubois (on behalf of Dubois, Denise); Joannie Proteau, (on behalf of Dubois, Maxime); Maude Faucher (on behalf of Faucher, Marie-Noelle); Sandy Bedard (on behalf of Guertin Jr., Michel); Raymond Lafontaine, Pierrette Boucher Lafontaine (on behalf of Lafontaine, Gaetan); Pascal Lafontaine (on behalf of Lafontaine, Karine); Clermont Pepin (on behalf of Lajeunesse, Éric Pépin); Marie-Eve Lapierre (on behalf of Lapierre, Stéphane); Diane Belanger (on behalf of Lapointe, Joannie); Marie Josee Grimard (on behalf of Latulippe, Henriette); Georgette Martin (on behalf of David Martin); Karine Paquet (on behalf of Paquet, Roger); Alexia Dumas-Chaput (on behalf of Pelletier, Mathieu); Robert Picard (on behalf of Picard, Louisette Poirer); Mario Poulin (on behalf of Poulin, Marianne); Lily Rodrique (on behalf of Rodrique, Martin); Maxime Roy, Carol-Anne Roy (on behalf of Roy, Jean-Pierre); Lise

Doyon (on behalf of Roy, Kevin); Rejean Roy (on behalf of Roy, Melissa); Mario Sévigny (on behalf of Sévigny, Andrée-Anne); Michel Sirois, Solange Belanger (on behalf of Sirois, Jimmy); Richard Turcotte, Christine Pulin (on behalf of Turcotte, Elodie); Suzanne Bizier (on behalf of Turmel, Joanie); Annick Roy (on behalf of Veilleux, Jean-Guy); and Sophie Veilleux (on behalf of Veilleux, Richard).

2. The victims are Marie Semie Alliance, David Lacroix Beaudoin, Alyssa Charest Begnoche, Bianka Charest Begnoche, Talitha Coumi Benoché, Diane Bizier, Stéphane Bolduc, Yannick Bouchard, Eliane Parenteau Boulanger, Marie France Boulet, Yves Boulet, Frédéric Boutin, Genevieve Breton, Karine Champagne, Sylvia Charron, Kathy Clusiaux, Real Custeau, Denise Dubois, Maxime Dubois, Marie-Noëlle Faucher, Michael Guertin, Jr., Gaetan Lafontaine, Karine Lafontaine, Eric Pepin Lajeunesse, Stéphanie Lapierre, Joannie Lapointe, Henriette Latulippe, David Martin, Roger Paquet, Mathieu Pelletier, Louise Poirer Picard, Marianne Poulin, Martin Rodrique, Jean Pierre Roy, Kevin Roy, Melissa Roy, Andrée-Anne Sévigny, Jimmy Sirois, Elodie Turcotte, Joanie Turmel, Jean-Guy Veilleux and Richard Veilleux.